

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: March 17, 2009
RICHARD VALENTINE	:	VIOLATIONS:
	:	21 U.S.C. § 841(a)(1) (possession with
	:	intent to distribute five grams or more of
	:	cocaine base (“crack”) - 1 count)
	:	18 U.S.C. § 924(c)(1)(A) (possession of a
	:	firearm in furtherance of a drug
	:	trafficking crime - 1 count)
	:	21 U.S.C. § 844(a) (possession of
	:	oxycodone - 1 count)
	:	18 U.S.C. § 922 (g)(1) (convicted felon in
	:	possession of a firearm and ammunition -
	:	1 count)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about November 12, 2008, in Bensalem, in the Eastern District of Pennsylvania, defendant

RICHARD VALENTINE

knowingly and intentionally possessed with intent to distribute 5 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2008, in Bensalem, in the Eastern District of Pennsylvania, defendant

RICHARD VALENTINE

knowingly possessed a firearm, that is, a Jennings, Model 25, .25 caliber automatic pistol, serial number 233797, loaded with four live rounds of .25 caliber ammunition, and a second magazine loaded with four live rounds of .25 caliber ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine base (“crack”), in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2008, in Bensalem, in the Eastern District of
Pennsylvania, defendant

RICHARD VALENTINE

knowingly and intentionally possessed a mixture or substance containing a detectable amount of
oxycodone, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 844(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2008, in Bensalem, in the Eastern District of Pennsylvania, defendant

RICHARD VALENTINE,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm and ammunition, that is, a Jennings, Model 25, .25 caliber automatic pistol, serial number 233797, loaded with four live rounds of .25 caliber ammunition, and a magazine loaded with four live rounds of .25 caliber ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 922(g)(1) and 924(c), set forth in this indictment, defendant

RICHARD VALENTINE

shall forfeit to the United States of America, the firearm and ammunition involved in the commission of such offenses, including, but not limited to:

1. a Jennings, Model 25, .25 caliber automatic pistol, serial number 233797;
2. a magazine; and
3. eight rounds of .25 caliber ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

LAURIE MAGID
United States Attorney